IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
Case 5:09-cv-449-BO

R. DANIEL BRADY, ET AL.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	**PLAINTIFFS' SEPARATED MOTION FOR LEAVE TO CONDUCT JURISDICTIONAL DISCOVERY**
	)	
XE SERVICES LLC, BLACKWATER SECURITY CONSULTING LLC, ET AL.,	)	
	)	
Defendants.	)	
	)	

Pursuant to Fed. R. Civ. P. 7(b)(1), Local Civil Rule 7.1, EDNC, through undersigned counsel and upon the grounds set forth in the Memorandum of Law filed by Plaintiffs January 25, 2010, Plaintiffs respectfully move the Court for an order allowing them a ninety-day period to conduct limited discovery on the personal jurisdictional issue raised by Defendant Jeremy Ridgeway's Motion to Dismiss. In further support of this Motion, Plaintiffs show the Court the following:

1. On Monday, January 25, 2010, Plaintiffs filed a Motion for Leave to Conduct Jurisdictional Discovery, or in the Alternative, For an Extension of Time to Respond to Defendant Ridgeway's Motion to Dismiss, along with a memorandum of law in support thereof.

2. On February 2, 2010, undersigned counsel was electronically served with a Notice of Deficiency, directing counsel to re-file Plaintiffs' discovery motion and motion for extension of time as separate motions.

3. Accordingly, undersigned counsel is contemporaneously filing a separate motion for an extension of time to respond to Defendant Ridgeway's Motion to Dismiss, which will enable Plaintiffs to prepare responsive papers in a manner reflecting the Court's granting or denial of this discovery motion.

4. Although counsel was only served with a Notice of Deficiency in Case No. 5:09-cv-449 ("Case 449"), for consistency, counsel is serving identical separated motions in both Case 449 and Case No. 5:09-cv-450 ("Case 450").

WHEREFORE, upon the grounds set forth in the Memorandum of Law filed by Plaintiffs January 25, 2010 and for good cause shown, Plaintiffs respectfully move the Court for an order allowing them a ninety-day period to conduct limited discovery on the personal jurisdictional issue raised by Defendant Jeremy Ridgeway's Motion to Dismiss.

This, the 3rd day of February, 2010.

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CERTIFICATE OF SERVICE

I hereby certify that on February 3, 2010, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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